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Attorneys for Defendants
Credence Resource Management, LLC; and
DirecTV, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KARINA MARTINEZ,)	Case No.:
)	
Plaintiff,)	
vs.)	NOTICE OF REMOVAL OF ACTION
)	UNDER 28 U.S.C. § 1441(a)
)	[FEDERAL QUESTION]
DIRECTV, LLC; I.C. SYSTEMS, LLC;)	
CREDENCE RESOURCE)	
MANAGEMENT, LLC; and DOES 1-)	
10, inclusive,)	
Defendants.)	
)	
)	
)	
)	

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT Defendants, Credence Resource Management, LLC (“CRM”) and DirecTV, LLC (“DTV”) (collectively referred to

hereinafter as "Defendants") hereby removes to this Court the state court action described below.

1. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by defendant pursuant to the provisions of 28 U.S.C. § 1441(a) in that it arises under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* The Court has supplemental jurisdiction over the remaining claims under California state law pursuant to 28 U.S.C. § 1367.

2. On or about January 10, 2023, the action was commenced in the Superior Court of the State of California, County of Contra Costa, entitled, *Karina Martinez v. DirecTV, LLC; I.C. Systems, LLC; Credence Resource Management, LLC*, Case No. C23-00065 (the "State Court Action"). A copy of the Plaintiff's Summons and Complaint ("Complaint") is attached hereto as **Exhibit A**. Attached as **Exhibit B** is a true and correct copy of Defendants' Answer which was submitted for filing in the State Court Action on February 28, 2023. There have been no further proceedings in the State Court Action, and remaining Defendant, I.C. System, Inc., *erroneously sued as* I.C. Systems, LLC ("ICS", has not yet made any appearance in the State Court Action.

3. Defendant CRM was served with a copy of the Summons and Complaint on January 30, 2023. Thus, pursuant to 28 U.S.C. § 1446(b), Defendants have timely filed this Notice of Removal.¹

4. Defendant ICS consents to removal of the action. ICS's Consent to Removal is attached hereto as **Exhibit C**.

5. A copy of this Notice of Removal is being served upon Plaintiff and will be filed in the State Court Action.

¹ Although ICS consents to removal, it reserves all rights, including its rights to object to proper service of the Summons and Complaint upon ICS.

1 6. The State Court Action is located within the Central District of
2 California. Therefore, venue for purposes of removal is proper because the United
3 States District Court for the Central District of California embraces the place in
4 which the removed action was pending. 28 U.S.C. § 1441(a).

5 7. Removal of the State Court Action is therefore proper under 28 U.S.C.
6 §§ 1441 and 1446.

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8 Dated: 3/1/2023

SESSIONS ISRAEL & SHARTLE, LLP

9
10 /s/Kenneth A. Ohashi

Kenneth A. Ohashi

11 Attorney for Defendants

12 Credence Resource Management, LLC and
13 DirecTV, LLC
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